

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SUPPRESSED

FILED

UNITED STATES OF AMERICA,) APR - 3 2024
)
 Plaintiff,) U. S. DISTRICT COURT
 EASTERN DISTRICT OF MO
 ST. LOUIS
)
 v.) No. S1 4:24-cr-00002-SEP-JMB
)
 MICHAEL GRODNER,)
 ANTHONY RAMOS,)
 RUBEN VIRUET-STEVENS,)
 CLEMENTE CASTRACUCCO,)
 TIMOTHY DERRICO,)
 CASEY SEDBERRY,)
 SUZANNE ACCURSO,)
 OLADIRAN AJAYI-OBE a/k/a "TJ",)
 RICHARD OWENS a/k/a "POPS", and)
 HENNA HARRIS a/k/a "H",)
)
 Defendants.)

SUPERSEDING INDICTMENT

The Grand Jury charges that, at times relevant to this Indictment:

INTRODUCTION

1. The defendants were members of a conspiracy that carried out a bank-fraud scheme across the country. As part of the scheme, the conspirators obtained counterfeit ID cards, including counterfeit United States passport cards, that displayed photographs of the conspirators but reflected the names and dates of birth of the conspirators' victims—namely, people who had legitimate accounts at FDIC-insured banks. The conspirators went to the victims' banks and used the counterfeit ID cards to impersonate the victims and fraudulently withdraw money from the victims' accounts. Through the defendants' bank-fraud scheme, the conspirators fraudulently obtained, or attempted to obtain, hundreds of thousands of dollars from more than 15 FDIC-insured banks in over 10 states.

FEDERALLY-INSURED FINANCIAL INSTITUTIONS

2. Each of the banks listed below is a “financial institution” within the meaning of 18 U.S.C. § 20(1), in that the deposits of each are insured by the Federal Deposit Insurance Corporation (“FDIC”), and each has branch locations in, among other places, the states specified below:

- a. BancFirst: Oklahoma;
- b. Banner Bank: Oregon and Washington;
- c. BMO Bank National Association (“BMO”): Wisconsin;
- d. BOKF, National Association (“BOKF”): Arizona, New Mexico, and Texas;
- e. Columbia State Bank n/k/a Umpqua Bank (“Columbia State Bank”): Oregon and Washington;
- f. Commerce Bank: Missouri;
- g. First Horizon Bank: Louisiana;
- h. German American Bank: Indiana and Kentucky;
- i. Ixonia Bank: Wisconsin;
- j. Johnson Bank: Wisconsin;
- k. Monona Bank n/k/a Lake Ridge Bank (“Monona Bank”): Wisconsin;
- l. Simmons Bank: Arkansas;
- m. Town Bank, National Association (“Town Bank”): Wisconsin;
- n. UMB Bank, National Association (“UMB Bank”): Arizona, Kansas, and Missouri;
- o. Washington Federal Bank (“WaFd Bank”): Washington;

- p. Waukesha State Bank: Wisconsin; and
- q. Westbury Bank: Wisconsin.

COUNT ONE
(Bank Fraud Conspiracy: 18 U.S.C. § 1349)

3. Beginning by at least in or around August 2022, and continuing through at least in or around March 2023, within the Eastern District of Missouri and elsewhere, the defendants,

**MICHAEL GRODNER,
ANTHONY RAMOS,
RUBEN VIRUET-STEVENS,
CLEMENTE CASTRACUCCO,
TIMOTHY DERRICO,
CASEY SEDBERRY,
SUZANNE ACCURSO,
OLADIRAN AJAYI-OBE a/k/a “TJ”,
RICHARD OWENS a/k/a “POPS”, and
HENNA HARRIS a/k/a “H”,**

voluntarily and intentionally combined, conspired, confederated, and agreed with one another and others, known and unknown to the Grand Jury, to commit bank fraud, that is, to knowingly execute and attempt to execute a scheme and artifice to defraud financial institutions, and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of financial institutions by means of material false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

Object of the Conspiracy

4. The object of the conspiracy was to fraudulently obtain money from FDIC-insured banks by using counterfeit ID cards, including counterfeit United States passport cards, to impersonate victims who had legitimate accounts at the banks and make unauthorized withdrawals from those accounts.

Manner and Means of the Conspiracy

It was part of the conspiracy that:

5. Defendant Richard Owens a/k/a “Pops” (“Defendant Owens”) and Defendant Henna Harris a/k/a “H” (“Defendant Harris”), along with other conspirators, known and unknown to the Grand Jury, recruited conspirators, including, but not limited to, Defendant Michael Grodner (“Defendant Grodner”), to join and participate in the defendants’ bank-fraud scheme.

6. Defendant Oladiran Ajayi-Obe a/k/a “TJ” (“Defendant Ajayi-Obe”), along with other conspirators, known and unknown to the Grand Jury, served as an organizer of the conspiracy in that, among other things:

a. Defendant Ajayi-Obe obtained counterfeit ID cards, including counterfeit United States passport cards, so that other conspirators could carry out the defendants’ bank-fraud scheme by using the cards to impersonate victim account holders;

b. Defendant Ajayi-Obe booked flights so that he and other conspirators could carry out the defendants’ bank-fraud scheme by travelling to and from states across the country where the victim account holders’ banks were located. When the conspirators travelled on these flights, some flew under their own names, and some flew under other people’s names; and

c. Defendant Ajayi-Obe rented cars so that once he and other conspirators reached their flights’ end destinations, they could carry out the defendants’ bank-fraud scheme by driving to banks at which the victim account holders had accounts. On numerous occasions, Defendant Ajayi-Obe rented the cars using a counterfeit ID card that reflected the name “Mohamed Ifthikar.”

7. After travelling on the flights and renting the cars, one or more of the conspirators typically served as a driver; one or more of the conspirators typically served as the person who went inside the banks to impersonate victim account holders; and one or more of the conspirators sometimes served as an observer to learn how the defendants' bank-fraud scheme operated. On numerous occasions, Defendant Ajayi-Obe and Defendant Anthony Ramos ("Defendant Ramos") served as a driver, and Defendant Grodner, Defendant Clemente Castracucco ("Defendant Castracucco"), Defendant Timothy Derrico ("Defendant Derrico"), Defendant Casey Sedberry ("Defendant Sedberry"), and Defendant Suzanne Accurso ("Defendant Accurso") served as the person who went inside the banks to impersonate victim account holders. And, on at least one occasion, Defendant Ruben Viruet-Stevens ("Defendant Viruet-Stevens") served as an observer to learn how the defendants' bank-fraud scheme operated.

8. Before the conspirators went inside the banks, another conspirator provided them with counterfeit ID cards, including counterfeit United States passport cards. The counterfeit ID cards reflected the names and dates of birth of victims who had legitimate accounts at the banks. However, despite reflecting the names and dates of birth of the victim account holders, the counterfeit ID cards displayed photographs of the conspirators who went inside the banks to impersonate the victim account holders.

9. Before the conspirators went inside the banks, another conspirator provided them with other identifying information, such as social security numbers, of the victim account holders. On numerous occasions, the conspirators also created and obtained counterfeit checks that reflected the victim account holders' information.

10. When the conspirators went inside the banks and used counterfeit ID cards, including counterfeit United States passport cards, to impersonate victim account holders, they sometimes deposited counterfeit checks into the victims' accounts and then immediately withdrew money from the accounts, and they sometimes simply withdrew money from the accounts without first depositing counterfeit checks.

11. Between in or around August 2022 and in or around March 2023, the conspirators used the manner and means described above to carry out the defendants' bank-fraud scheme at more than 15 FDIC-insured banks in over 10 states and, in doing so, fraudulently obtained, or attempted to obtain, more than \$200,000 from those banks, including, but not limited to, on the following occasions:

Date	Bank	City, State	Conspirators	Actual/Attempted Counterfeit Check Deposit Amount	Actual/Attempted Withdrawal Amount
8/18/22	WaFd	Auburn, WA	Defendant Castracucco Defendant Ajayi-Obe	\$4,500	\$6,000
8/18/22	Banner Bank	Federal Way, WA	Defendant Castracucco Defendant Ajayi-Obe	None	\$2,500
8/18/22	Banner Bank	Kent, WA	Defendant Castracucco Defendant Ajayi-Obe	\$3,900	\$3,900
8/18/22	Columbia State Bank	Auburn, WA	Defendant Castracucco Defendant Ajayi-Obe	\$4,500	\$6,500
8/19/22	WaFd	Federal Way, WA	Defendant Castracucco Defendant Ajayi-Obe	\$4,500	\$6,000
8/23/22	Banner Bank	Mercer Island, WA	Defendant Castracucco Defendant Derrico Defendant Ajayi-Obe	\$4,500	None
8/24/22	WaFd	Kent, WA	Defendant Castracucco Defendant Derrico Defendant Ajayi-Obe	\$4,500	\$4,500
8/25/22	Columbia State Bank	Auburn, WA	Defendant Castracucco Defendant Derrico Defendant Ajayi-Obe	\$4,500	\$6,500

Date	Bank	City, State	Conspirators	Actual/Attempted Counterfeit Check Deposit Amount	Actual/Attempted Withdrawal Amount
8/25/22	Banner Bank	Renton, WA	Defendant Castracucco Defendant Derrico Defendant Ajayi-Obe	None	\$6,500
9/13/22	Columbia State Bank	Salem, OR	Defendant Castracucco Defendant Ajayi-Obe	\$4,500	\$6,500
9/13/22	Banner Bank	Tualatin, OR	Defendant Castracucco Defendant Ajayi-Obe	\$4,500	None
9/14/22	Columbia State Bank	Tigard, OR	Defendant Castracucco Defendant Ajayi-Obe	\$4,500	\$6,500
9/22/22	German American Bank	Greensburg, IN	Defendant Castracucco Defendant Ajayi-Obe	None	\$6,000
9/22/22	German American Bank	Columbus, IN	Defendant Castracucco Defendant Ajayi-Obe	None	\$4,500
10/4/22	German American Bank	La Grange, KY	Defendant Castracucco Defendant Ajayi-Obe	\$4,500	\$7,000
10/4/22	German American Bank	Shelbyville, KY	Defendant Castracucco Defendant Ajayi-Obe	\$4,500	\$4,000
10/13/22	German American Bank	Shelbyville, KY	Defendant Castracucco Defendant Ajayi-Obe Defendant Derrico	None	\$6,500 \$1,000
10/27/22	BOKF	Albuquerque, NM	Defendant Castracucco Defendant Ajayi-Obe	\$4,500	\$7,500
10/27/22	BOKF	Albuquerque, NM	Defendant Castracucco Defendant Ajayi-Obe	None	\$5,000
11/1/22	UMB Bank	Peoria, AZ	Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso	\$4,500	\$7,500
11/1/22	UMB Bank	Phoenix, AZ	Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso	None	\$6,000
11/1/22	BOKF	Mesa, AZ	Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso	\$4,500	\$7,500

Date	Bank	City, State	Conspirators	Actual/Attempted Counterfeit Check Deposit Amount	Actual/Attempted Withdrawal Amount
11/18/22	BOKF	Dallas, TX	Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos	\$4,500	None
11/29/22	Waukesha State Bank	New Berlin, WI	Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso	\$4,500	\$6,500
11/29/22	Westbury Bank	Germantown, WI	Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso	\$4,500	\$3,500
11/30/22	Johnson Bank	Racine, WI	Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso	\$4,500	\$6,500 \$1,500
11/30/22	Johnson Bank	Kenosha, WI	Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso	None	\$5,000
11/30/22	Johnson Bank	Racine, WI	Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso	\$4,500	\$7,000 \$2,000
11/30/22	BMO	Kenosha, WI	Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso	\$4,500	\$8,000
11/30/22	BMO	South Milwaukee, WI	Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso	None	\$1,000
12/1/22	Monona Bank	Cottage Grove, WI	Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso	\$4,500	\$6,000
12/1/22	Monona Bank	Monona, WI	Defendant Castracucco Defendant Ajayi-Obe Defendant Ramos Defendant Accurso	None	\$4,000

Date	Bank	City, State	Conspirators	Actual/Attempted Counterfeit Check Deposit Amount	Actual/Attempted Withdrawal Amount
1/5/23	Simmons Bank	Cabot, AR	Defendant Ajayi-Obe Defendant Ramos Defendant Accurso	\$4,200	None
1/5/23	Simmons Bank	Conway, AR	Defendant Ajayi-Obe Defendant Ramos Defendant Accurso	\$4,500	\$6,500
1/13/23	First Horizon Bank	New Orleans, LA	Defendant Ajayi-Obe Defendant Ramos Defendant Sedberry	\$4,500	\$8,000
1/13/23	First Horizon Bank	Metairie, LA	Defendant Ajayi-Obe Defendant Ramos Defendant Sedberry	None	\$5,000
1/13/23	First Horizon Bank	Kenner, LA	Defendant Ajayi-Obe Defendant Ramos Defendant Sedberry	\$4,500	\$8,000
1/13/23	First Horizon Bank	Metairie, LA	Defendant Ajayi-Obe Defendant Ramos Defendant Sedberry	None	\$6,500
2/9/23	Waukesha State Bank	Menomonee Falls, WI	Defendant Ajayi-Obe Defendant Ramos Defendant Grodner	\$4,500	\$6,000
2/10/23	Town Bank	DelafIELD, WI	Defendant Ajayi-Obe Defendant Ramos Defendant Grodner	\$4,500	\$6,000
2/10/23	Town Bank	Wales, WI	Defendant Ajayi-Obe Defendant Ramos Defendant Grodner	None	\$6,200
2/10/23	Ixonia Bank	Oconomowoc, WI	Defendant Ajayi-Obe Defendant Ramos Defendant Grodner	\$4,500	\$6,000
2/15/23	BancFirst	Yukon, OK	Defendant Ajayi-Obe Defendant Grodner	\$4,500	None
3/1/23	UMB Bank	Kansas City, KS	Defendant Ajayi-Obe Defendant Grodner	\$4,500	\$8,200
3/1/23	UMB Bank	Kansas City, KS	Defendant Ajayi-Obe Defendant Grodner	None	\$7,200
3/2/23	UMB Bank	Kansas City, MO	Defendant Ajayi-Obe Defendant Grodner	\$4,500	\$7,500
3/2/23	Commerce Bank	Kansas City, MO	Defendant Ajayi-Obe Defendant Grodner	\$4,500	\$8,000

Date	Bank	City, State	Conspirators	Actual/Attempted Counterfeit Check Deposit Amount	Actual/Attempted Withdrawal Amount
3/16/23	UMB Bank	Maryland Heights, MO (within the Eastern District of Missouri)	Defendant Ajayi-Obe Defendant Grodner Defendant Ramos Defendant Viruet-Stevens	\$4,500	None

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO
(Bank Fraud: 18 U.S.C. §§ 1344 and 2)

12. The above paragraphs are hereby realleged and incorporated by reference.
13. On or about March 16, 2023, Defendant Ajayi-Obe (flying under the name “Fritz Oslyn”), Defendant Grodner, Defendant Ramos, and Ruben Viruet-Stevens flew together from LaGuardia Airport to St. Louis Lambert International Airport.
14. When the group arrived in St. Louis, Defendant Ajayi-Obe rented a car from Enterprise Rent-A-Car by using a counterfeit ID card that reflected the name “Mohamed Ifthikar.”
15. Defendant Ramos then drove the rental car to UMB Bank in Maryland Heights, Missouri, within the Eastern District of Missouri, with Defendant Grodner riding in the front passenger seat of the car and Ruben Viruet-Stevens riding in the backseat of the car.
16. While Defendant Ramos and Ruben Viruet-Stevens (who was observing and learning the mechanics of the defendants’ bank-fraud scheme) sat in the car, Defendant Grodner went inside the bank with a counterfeit United States passport card that Defendant Ajayi-Obe had obtained. The counterfeit United States passport card reflected victim account holder C.J.V.’s name and date of birth but displayed Defendant Grodner’s photograph. Before Defendant Grodner went inside the bank, Defendant Ajayi-Obe provided him with other identifying information of victim account holder C.J.V. and C.J.V.’s business. After Defendant Grodner went inside the bank,

he used the counterfeit United States passport card to impersonate C.J.V. and attempted to deposit a counterfeit check into C.J.V.'s business's legitimate account at the bank.

17. On or about March 16, 2023, in Maryland Heights, Missouri, within the Eastern District of Missouri, the defendants,

**MICHAEL GRODNER,
ANTHONY RAMOS, and
OLADIRAN AJAYI-OBE a/k/a "TJ",**

being aided, abetted, counseled, encouraged, and induced by one another and others, known and unknown to the Grand Jury, knowingly executed and attempted to execute a scheme and artifice to defraud a financial institution, that is, UMB Bank, which is FDIC-insured, and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of such financial institution by means of material false and fraudulent pretenses, representations, and promises.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT THREE
(Use of False Passport: 18 U.S.C. §§ 1543 and 2)

18. The above paragraphs are hereby realleged and incorporated by reference.

19. On or about March 16, 2023, in Maryland Heights, Missouri, within the Eastern District of Missouri, the defendants,

**MICHAEL GRODNER,
ANTHONY RAMOS, and
OLADIRAN AJAYI-OBE a/k/a "TJ",**

being aided, abetted, counseled, encouraged, and induced by one another and others, known and unknown to the Grand Jury, willfully and knowingly used, attempted to use, and furnished to another for use a false, forged, and counterfeited passport and instrument purporting to be a

passport, to wit, a counterfeit United States passport card that reflected the name and date of birth of C.J.V. but displayed a photograph of Defendant Grodner.

All in violation of Title 18, United States Code, Sections 1543 and 2.

COUNT FOUR
(Aggravated Identity Theft: 18 U.S.C. §§ 1028A and 2)

20. The above paragraphs are hereby realleged and incorporated by reference.
21. On or about March 16, 2023, in Maryland Heights, Missouri, within the Eastern District of Missouri, the defendants,

**MICHAEL GRODNER,
ANTHONY RAMOS, and
OLADIRAN AJAYI-OBE a/k/a "TJ",**

being aided, abetted, counseled, encouraged, and induced by one another and others, known and unknown to the Grand Jury, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that being bank fraud in violation of 18 U.S.C. § 1344, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, to wit, a counterfeit United States passport card that contained the name and date of birth of C.J.V. but displayed a photograph of Defendant Grodner, knowing that the means of identification belonged to another actual person.

All in violation of Title 18, United States Code, Sections 1028A and 2.

COUNTS FIVE–NINE
(Aggravated Identity Theft: 18 U.S.C. §§ 1028A and 2)

22. The above paragraphs are hereby realleged and incorporated by reference.
23. On or about March 16, 2023, in Maryland Heights, Missouri, within the Eastern District of Missouri, the defendants,

**MICHAEL GRODNER and
OLADIRAN AJAYI-OBE a/k/a "TJ",**

being aided, abetted, counseled, encouraged, and induced by one another and others, known and unknown to the Grand Jury, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that being a conspiracy to commit bank fraud in violation of 18 U.S.C. § 1349, knowingly transferred and possessed, without lawful authority, a means of identification of another person, described below for each count, knowing that the means of identification belonged to another actual person:

Count	Means of Identification
5	Counterfeit United States passport card bearing the name and date of birth of C.A.E.
6	KeyBank credit card bearing the name C.A.E.
7	Counterfeit United States passport card bearing the name and date of birth of M.C.O.
8	Counterfeit United States passport card bearing the name and date of birth of K.G.T.
9	KeyBank credit card bearing the name K.G.T.

All in violation of Title 18, United States Code, Sections 1028A and 2.

FORFEITURE ALLEGATION

The Grand Jury further alleges there is probable cause that:

1. Pursuant to Title 18, United States Code, Section 982(a)(2), upon conviction of a conspiracy to violate Title 18, United States Code, Section 1344, affecting a financial institution, as set forth in Count One, the defendants shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violation.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting, or derived from, any proceeds traceable to such violation.

3. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

Justin M. Ladendorf #68558MO
Assistant United States Attorney